1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor Toni Hardesty, Director

February 26, 2008

Certified Mail No. 7190 0596 0014 0000 2055

Mr. Ken Glodo, General Manager Plastics Industries, Inc. 1234 Industrial Park Rd. Preston, ID 83263

RE: Facility ID No. 041-00012, Plastics Industries, Inc, Preston

Permit to Construct Application Incompleteness

Dear Mr. Glodo:

On February 20, 2008, the Department of Environmental Quality received a permit to construct application from Plastics Industries, Inc. for the initial PTC for an existing facility located in Preston. DEQ has reviewed the application materials and determined that the application is incomplete. DEQ needs the following information to determine the application complete:

Application Content

Application content should be prepared using the checklist. The checklist is based on the requirements contained in IDAPA 58.01.01.202.

- <u>Process Description(s)</u>. The process or processes for which construction is requested must be described in sufficient detail and clarity such that a member of the general public not familiar with air quality can clearly understand the proposed project. A process flow diagram is required for each process for which pre-permit construction approval is requested.
- Equipment List. All equipment that will be used for which construction is requested must be described in detail. Such description includes, but is not limited to, manufacturer, model number or other descriptor, serial number, maximum process rate, proposed process rate, maximum heat input capacity, stack height, stack diameter, stack gas flowrate, stack gas temperature, etc. All equipment that will be used for which construction is requested must be clearly labeled on the process flow diagram.
- <u>Potential to Emit.</u> Submit the uncontrolled potential to emit (pre-control equipment emissions estimates) and the controlled potential to emit (post-control equipment emissions estimates) for all equipment for which construction is requested. Any limit on the equipment for which construction is requested may become a limit on that equipment in the permit to construct.
- Potential to Emit and Modeled Ambient Concentration for All Regulated Air Pollutants. All proposed emission limits and modeled ambient concentrations for all regulated air pollutants must demonstrate compliance with all applicable air quality rules and regulations. Regulated air pollutants include criteria air pollutants, toxic air pollutants listed pursuant to IDAPA 58.01.01.585 and 586, and hazardous air pollutants listed pursuant to Section 112 of the 1990

Plastic Industries, Inc., Preston February 26, 2008 Page 2 of 2

Clean Air Act Amendments (go to http://www.epa.gov/ttn/atw/188polls.html).

Describe in detail how the proposed emissions limits and modeled ambient concentrations demonstrate compliance with each applicable air quality rule and regulation. It is requested that emissions calculations, assumptions, and documentation be submitted with sufficient detail so DEQ can verify the validity of the emissions estimates.

• <u>List all Applicable Requirements</u>. All applicable requirements must be cited by the rule or regulation section/subpart that applies for each emissions unit.

Recommended Re-submitting Application Actions

- Refer to the Rule. Read the Permit to Construct requirements contained in IDAPA 58.01.01.200-228, Rules for the Control of Air Pollution in Idaho. The Rules are available on DEQ's website (go to http://adm.idaho.gov/adminrules/rules/idapa58/0101.pdf).
- Refer to DEQ's Permit to Construct Guidance Document. DEQ has developed a guidance document to aid applicants in submitting a complete permit to construct application. The guidance document is located on DEQ's website (go to http://www.deq.idaho.gov/air/permits forms/permitting/ptc_prepermit_guidance.pdf).
- <u>Submit Ambient Air Quality Modeling Protocol</u>. It is required that an ambient air quality modeling protocol be submitted to DEQ at least two (2) weeks before the permit to construct application is submitted. Contact DEQ's Air Quality Hotline at 877-573-7648 for information about the protocol.

Submission of the requested information is due within 30 days of receipt of this incompleteness letter. If you need more time to respond to the letter, contact me prior to the 30 day deadline. If DEQ does not receive the needed information or a request for extension prior to the 30 day deadline the project will be terminated and a new permit application fee will be required when the application is resubmitted.

Since DEQ has declared the application incomplete, review of this project has ceased. Processing of this application will resume upon submission of sufficient information and the project timeline for permit issuance will restart.

If you have any questions about this incompleteness letter or about the permitting process, please contact me at (208) 373-0502 or Joanthan.Pettit@deq.idaho.gov.

Sincerely,

Jonathan Pettit Permit Writer

Air Quality Division

JP/hp

Permit No. P-2008.0020

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Reading File c: Source File

Bill Rogers, Permit Coordinator